1 **UNITED STATES DISTRICT COURT** 2

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2019 7 13 AM II: 5 COMPLAINT

SOUTHERN DISTRICT OF NEW YORK STATES OF THE WAY.

WHITE PLAINS DISTRICT COURT

300 Quarropas St.

White Plains, NY 10601

18 CV 6369

John Joseph Cullen,

Plaintiff & **Jury Trial: YES** 

Leader of SUSPENDED CLASS ACTION DOL 2012-SOX-00023

-against-

CITIBANK, N.A. (JAMES C. HUGHES, IV, Esq. & MICHAEL J. CAROLAN)

17 &

U.S. Department of Labor - OSHA ( JONATHAN KAY & TERI WIGGEN )

& 20

U.S. Department of Justice (PREET BHARARA & MARK MISOREK, Assistant U.S. Attorney)

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1	Parties in this complaint:	
2	1. A Plaintiff:	
3	John Joseph Cullen	
5	Bronxville Manor	
6	208 Beech Street	
7	Eastchester, NY 10709	
8 9	Cell Tel # 914-715-0282.	
10		
11	B. Defendants:	
12	1. CITIBANK, N.A.	
13	(JAMES C. HUGHES, IV, Esq. & MICAHEL J. CAROLAN)	
14	C/O Carlos Lopez, Branch Manager	
15 16	725 White Plains Road	
17		
18	Scarsdale, NY 10583	
19	Tel. 914 472-1243	
20		
21	2. U.S. Department of Labor - OSHA	
22	(JONATHAN KAY & TERI WIGGEN)	
23	C/O Regional Administrator Robert D. Kulick	
25	201 Varick Street , Room 670	
26	New York, NY 10014	
27	Tel. 212 337-2371	
28	PLEADING TITLE - 2	

1 2 3. U.S. Department of Justice 3 (PREET BHARARA & MARK MISOREK Assistant U.S. Attorney) 4 610 Federal Plaza 5 6 Central Islip, NY 11722-4454 7 Tel. 631 715-7922 8 9 il. Basis for Jurisdiction: 10 11 12 A. The basis for this Federal Court Jurisdiction is both a Federal Question and Diversity of Citizenship. 13 14 15 B. It is a FEDERAL QUESTION because as a "Dec 1999 GRANDFATHERED & PROTECTED" 16 CITIBANK VP & TRUST OFFICER I was WRONGFULLY TERMINATED by "AFFILIATED" SMITH BARNEY. In that capacity, I have been asked to testify in WHITE PLAINS, NY 17 FEDERAL DISTRICT COURT, BROOKLYN, NY FEDERAL COURT, HOUSTON TEXAS FEDERAL COURT, PITTSBURGH, PA FEDERAL COURT, SAN DIEGO, CA PROBATE COURT, 18 MANHATTAN, NY SURROGATE'S COURT and I expect to testify to CONGRESS about the 19 8/2/12 SUSPENSION of CLASS ACTION DOL-2012-SOX-00023 and its impact on HILLARY R. CLINTON and the 2016 Presidential Election. 20 21 22 C. DIVERSITY OF CITISENSHIP is an issue because I am also the Federal Court appointed leader of Suspended CLASS ACTION DOL-2012-SOX-00023, representing: 23 24 1. the 4,600 CITI TRUST victim Client families who live throughout the world and had the digital image of their photographs and their confidential Trust Files stolen by SMITH 25 BARNEY and sent by Internet, outside U.S. Jurisdiction, to first stop, INDIA. 26 One of those CITI TRUST client victims is 2016 Presidential Candidate HILLARY R. 27 CLINTON. 28 PLEADING TITLE - 3

PLEADING TITLE - 4

I BELIEVE that on 8/2/12 DOJ's PREET BHARARA, DOL'S JONATHAN KAY, and OSHA'S TERI WIGGEN effectively "COLLUDED" with Donald Trump's Morgan Lewis & Bockius lawyers: DOJ'S LESLIE R. CALDWELL & JEREMY PAUL BLUMENFELD, to WITHHOLD EVIDENCE from Washington, DC, FEDERAL JUDGE Col. Stephen Henley, who was Hearing CLASS ACTION DOL-2012-SOX-00023. It is the 24 pounds of White Plains Federal transcripts (7:08 CV 10317 ( KMK )( GAY ) & 7:08 CV 10318 (KMK )(GAY ) and BROOKLYN Federal transcripts 09:CV 1692 ( RRM ) ( LB ) my CITIBANK lawyer & boss since 9/16/98 to date, JAMES C. HUGHES, IV had me generate for CITIBANK, starting after 11/28/07 to get SMITH BARNEY & TRAVELRS kicked out of (To BIG to FAIL ) CITIBANK.

I BELIEVE "if "Washington, DC FEDERAL JUDGE Col. STEPHEN HENLEY, was allowed to know on 8/2/12 that SMITH BARNEY'S CITIGROUP got an extra \$20 BILLION in TAXPAYER TARP FUNDS, in Nov. 2008, from 'LAME DUCK" President GEORGE "W" BUSH to hire his WHITE HOUSE Counsel FRED FISCHER FIELDING'S Morgan Lewis & Bockius partners DOJ'S LESLIE R. CALDWELL and JEREMY "EARS" BLUMENFELD, to get BUSH appointed WHITE PLAINS Federal District Judge KENNETH M. KARAS to put illegal FEDERAL GAGS, on DOLOSHA Whistleblowers, Veronica & me, for years, HILLARY CLINTON would have been elected POTUS in 2016 !!!!

2. Under her Limited Durable Power of Attorney, dated 3/8/10, I am the U.S. Department of Labor recognized advocate for my Co-Whistleblower, BOOM BOOM ROOM DISABLED VICTIM Veronica Juliano.

By extension, I advocate for 15 of our CITI TRUST women co-workers. I witnessed and reported the abuse of these 16 CITI TRUST women workers by CITI TRUST WHITE MEN MANAGERS to HR and JAMES C. HUGHES, IV. These 16 women CITI TRUST workers were intimidated, misadvised, yelled & screamed at to make them sign FALSE FEDERAL FIDUCIARY documents to fool internal auditors and FEDERAL REGULATORS to coverup SANDY WEILL'S Criminal Enterprises in my CITIBANK TRUST DEPT.

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3. Since my Citibank ERISA pension is miscalculated, 'the World Wonders' about the other 100,000 Citigroup employees forced into early retirement by SANDY WEILL'S & JAMIE DIMON'S illegal takeover of my CITIBANK, N.A. ?

Fortuitously, CITI TRUST Client Victim HILLARY R. CLINTON lives in Chappaqua, another CITI TRUST VICTIM the POPE FOUNDATION is in Tuckahoe, I live in Eastchester, etc., therefore, the WHITE PLAINS FEDERAL DISTRICT COURT is mutually convenient for us to testify before a Federal Judge & Jury.

## III. Statement of Claim:

The U.S. Department of Justice's MARK MISOREK, Tel. # 631 715-7874, on 4/17/18,

in front of his intimidating 4 man HOMELAND SECURITY armed S.W.A.T. Unit,

in front of my U.S. NAVY / MARINE CORPS Representative "Frankie D.", who said he flew Vigilantes off the USS Ranger during Vietnam.

in front of TOURO LAW SCHOOL'S Director of Veteran's Rights, Craig J. Bruno, Esq., Tel.# 631-761-7476, and

in front of my daughter, who had her son's picture taken with my wife pushing his baby carriage around Eastchester, on six different days, by SMITH BARNEY'S CITIGROUP'S Private Investigator CLAUDETTE MAIR, to intimidate me into not testifying for "CIA AGENT" ROY ALAN DURHAM before the COMPTROLLER of the CURRENCY.

DOJ'S MISOREK "falsely" accused me of committing a Federal Crime on 1/31/18.

DOJ'S MISOREK on 4/17/18 claimed he has:

- 1. A telephone recording of me threatening OSHA Executive TERI WIGGEN
- 2. Statements from SPECIAL AGENTS JAMES WOODS & MAUREEN E. BUONETO Tei. # 646 264-3551 confirming they came into my home, uninvited, on 1/19/18, and 'warned me' there was "CONCERN" if I went to the 1400 building on 1/30/18 and ordered the F.O.I.L. FILE for SUSPENDED CLASS ACTION DOL-2012-SOX-00023 / Cuilen et al v. CITIBANK et al" to use as support for my REPORT to CONGRESS: Hillary's CITI GROUP, Donald's "EARS" BLUMENFELD, Whistleblowers Veronica & me"

NOBLE.

 The U.S. CONSTITUTION permits me, as the accused in a \$multi-million matter involving AMERICA'S HOMELAND SECURITY, and DEEP STATE tampering with the 2016 Presidential Election, a PUBLIC FEDERAL TRIAL BY JURY.

3. U.S Govt Surveillance (Facial recognition?) Video of me committing a Federal

Crime on 1/31/18, ( See Attached summons # 618551 ) when I went to 1400 Old

Country Road, Westbury, Long Island to the Regional Headquarters of BARNES &

My CITIBANK boss & lawyer ( since 9/16/98 to date ) JAMES C. HUGHES, IV, missed the 2/22/18 & 2/23/18 scheduled meeting with OSHA'S TERI WIGGEN and me to turn over my EVIDENCE in exchange for REINSTATEMENT. HUGHES may have been compromised, so I may have to testify, alone, before Congress about our Whistleblower experiences against SMITH BARNEY & TRAVELER'S and our disappointing dealings with the Manhattan DA, DOL, OSHA, DOJ, NYAG, PAAG, etc.,

I have the right to defend myself from False Federal DOJ accusations made on 4/17/18 and get my 134 pages of INTELLECTUAL PROPERTY returned so I can finish it, and submit my REPORT to CONGRESS, without the stigma of being an accused Federal Criminal.

NOTE: On 1/31/18 I also dropped off in the OSHA office on the same day, on the same 8th Floor, in the same 1400 building, my one page F.O.I.L. request for Suspended CLASS ACTION DOL-2012-SOX-00023 / JJ CULLEN et al v. CITIBANK et al. I needed the F.O.I.L. FILE to present to my CITIBANK lawyer & boss since 9/16/98 to date, JAMES C. HUGHES, IV on 2/23/18 so I could be reinstated in CITIBANK then retire on 3/17/18, as scheduled since 2005.

PLEADING TITLE - 7

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I have the right to defend myself from False Federal DOJ accusations and get my 134 pages of INTELLECTUAL PROPERTY returned so I can finish it, and submit my REPORT to CONGRESS, without the stigma of being an accused Federal Criminal.

In Feb. 2007, CITIBANK'S HUGHES told me to contact the U.S. DEPT. of LABOR, since SMITH BARNEY Executives refused to return an ORTHOPEDIC CHAIR, which we had gotten for CITIBANK employee VALERIE CUSION-BROWNLEE in 2004 under the AMERICANS WITH DISABILITIES ACT. I contacted DOL NY Regional Director JONATHAN KAY who assigned Investigators MARIA ABUAN and her supervisor VALERI TOURSO.

In the Summer of 2007, SMITH BARNEY Executives ordered me to put a \$1,000,000 painting STOLEN from the WHITE HOUSE into a CITIBANK TRUST for me to sell at SOTHEBY'S. I REFUSED, TO LAUNDER STOLEN PROPERTY!!!

A SMITH BARNEY Executive said I was INSUBORDINATE. HUGHES told me to send him a "Justification Memo" detailing the stolen WHITE HOUSE panting's provenance.

On 11/28/07, "AFFILIATED" SMITH BARNEY Executives told me I was TERMINATED as of 1/29/08 and I could NOT take "my" SALES TRACKING SOFTWARE (with its 1996 evidence of the "MURDER" of the CITIBANK TRUST OFFICER.)

Before my 1/29/08 Wrongful Termination by "AFFILIATE SMITH BARNEY", CITIBANK'S HUGHES made me an offer I did not refuse.

- CITIBANK and President GEORGE 'W.' BUSH were working on funding a Federal Gov't plan (TAXPAYER FUNDED - TROUBLED ASSET RELIEF PROGRAM (TARP) to kick SMITH BARNEY & TRAVELERS out of President Clinton's 1998 CITIGROUP.
- 2. It was illegal for "AFFILIATED" SMITH BARNEY Executives to Terminate CITIBANK'S GRANDFATHERED & PROTECTED EMPLOYEES like Richard F. Monaghan and me. SMITH BARNEY illegally crossed a corporate CHINESE WALL.
- SMITH BARNEY violated every AGE DISCRIMINATION LAW on the books, since my Personnel File from 2005 shows I planned to work until 3/17/18, and, I was a top rated CITIBANK Trust Administration Officer (2006 "360" REVIEW & CLIENT LETTERS).

- 4. SMITH BARNEY has no legal right to keep my SALES TRACKING SOFTWARE, which I created as an Iona College / Mercy College when an Adjunct Professor (1974-1982) and used at JPMORGAN, IRIVNG TRUST COMPANY / BANK of NEW YORK and I brought into CITIBANK in 1994 for my exclusive use on the PC CITIBANK provided.
- 5. SMITH BARNEY should not have allowed the abuse of the 16 CITI TRUST women employees by WHITE MEN MANAGERS, which I had reported to HR & HUGHES ( & later DOL & OSHA) ------
- 6. HUGHES offered to employee me as a secret

  CITIBANK'S "PLAINTIFF STRAWMAN". I NEVER FILED FEDERAL
  PLAINTIFF CLAIMS suing my employer, CITIBANK, for
  whistleblowers Veronica & me. HUGHES arranged ALL the
  FEDERAL LITIGATION, I was just CITIBANK'S secret weapon, its
  "PLAINTIFF STRAWMAN" following CITIBANK'S HUGHES
  orders.
- 7. HUGHES promised in exchange for any documents I could get through all the FEDERAL Court Actions, HUGHES started, (11 boxes) documents, CITIBANK would reinstate whistleblowers BOOM BOOM ROOM DISABLED VICTIM Veronica & me, with back pay, reimbursed expenses, interest, bonuses, promotions, etc. I would work alone like a "RECON MARINE in the DMZ".
- 8. I am owed over \$3,000,000 in back pay and expenses and return of my SALES TRACKING SOFTWARE.
- 9. I think BOOM BOOM ROOM VICTIM Veronica and the 15 abused women are owed much more, especially for taking away Valerie's orthopedic chair in violation of the <u>Americans</u> with Disabilities Act.

Also, I want an apology from WHITE PLAINS FEDERAL DISTRICT JUDGE KENNETH M. KARAS for his ex-party meetings with DONALD TRUMP'S Morgan Lewis & Bockius lawyers, without PRO SE ME, and putting illegal Federal GAGS on Whistleblowers Veronica & me, for years, so we would stop asking:

- a. Why was SANDY WEILL using the CITIBANK JET to have secret meetings in SAUDI ARABIA prior to 9/11/01?
- b. Why just a few days before the SAUDI 9/11/01 attacks on America, did SANDY WEILL order that HILLARY CLINTON'S BLIND TRUST FILE be barcoded and its digital image be sent by Internet, outside U.S. Jurisdiction, to first stop. INDIA, to join the other 4,600 stolen Digital Trust files in INDIA?
- c. Is SANDY WEILL'S & JAMIE DIMON'S "CITIGROUP" ever going to admit its guilt and compensate the 4,600 CITI TRUST client families for selling the digital file copy of their photographs and clients TRUST FILES to INDIA?
- 10. The 16 abused CiTI TRUST women employees I reported to CITIGROUP HR & JAMES C. HUGHES, IV, Esq., DOL-0SHA,
- I think are owed \$1MM each.
- 11. The 4,600 CITI TRUST client families who had the DIGITAL COPY of their photos and TRUST FILES sent to INDIA I think are owed \$1MM each.
- 12. I also think all the politicians and federal employees I contacted about the 9/11/01 abuse of HILLARY CLINTON'S BLIND TRUST being sent to INDIA etc., like DOJ'S PREET BHARARA, should rot in prison for life.

## III STATEMENT OF CLAIM

- A. Where did the events giving rise to your claims occur?
- White Plains Federal District Court, 7:08 CV 10317 (KMK) (GAY) and 7:08 CV 10318
- (KMK) (GAY)
  - PLEADING TITLE 10

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B. What date and approximate time did the events giving rise to your claim occur?

April 17, 2018, at 10:45 AM when the DOJ illegally took 134 pages of my INTELLECTUAL PROPERTY, the 4/16/18 draft of my:

REPORT to CONGRESS: Hillary's CITI GROUP, Donald's "EARS" BLUMENFELD, Whistleblowers Veronica & me

## C. FACTS:

- 1. As stated above and in the 4/16/18 draft of my REPORT to CONGRESS illegally taken by the DOJ.
- 2. The F.O.I.L. FILE of CLASS ACTION DOL-2012-SOX-00023, which is 31% REDACTED.
- 3. HUGHES arranged for CLIENTS to SUBPOENA Whistlebiowers Veronica & me so we could testify under oath,
- 4. HUGHES arranged for Newspaper articles about Whistleblowers Veronica & me,
- HUGHES arranged for me to develop 24 POUNDS of FEDERAL COURT transcripts for CITIBANK.
- MARIANNA LOMBARDO, Veronica's Administrative Assistant, God Bless her, gave me 40 pages HERZOG documents
- 7. LAWYERS working for the Estate HUGUETTE CLARK and other CITII TRUST clients gave me documents
- 8. Federal Summons # 6185551 ordering me to appear before a FEDERAL MAGISTRATE JUDGE on 4/17/18 etc., etc.

## **IV. INJURIES**

- According to Social Security Administration, Whistleblower Veronica Juliano became "Permanently Mentally Disabled" after being put into the 3/9/07 BOOM BOOM ROOM.
- 2. I suffered congestive Heart Failure just days prior to the 2016 CLINTON V. TRUMP election, was put into 3 hospitals, and I have been seeing a therapist for stress reduction through BURKE HOSPITAL REHABILITATION ever since.

1	v. relief:
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3	
4	1. A FEDERAL TRIAL BY JURY to address the above issues.
5	
6	
7	I DECLARE UNDER PENALTY OF PERIURY THAT THE FOREGOING IS TRUE AND CORRECT
8	and I am an non-lawyer ADVOCATE for my co-whistleblower, VERONICA JULIANO, under
9	her Limited Durable Power of Attorney executed 3/8/10.
10	
11	JOHN JOSEPH CULLEN Johnsto ulle
12	DATE 7/12/18
13	Bronxville Manor
14	208 Beech Street
15	Eastchester, New York 10709
16	Cell Tel # 914 715-0282
17	Cell 161# 514 /13-0282
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U.S. Department of Labor

Occupational Safety and Health Administration 201 Varick Street, Room 670 New York, New York 10014 Tel: (212) 337-2378 Fax: (212) 337-2371



January 29, 2018

Mr. John Cullen 208 Beech Street Eastchester, NY 10709

Dear Mr. Cullen:

Please be aware, as you have been previously informed by OSHA, that your March 22, 2012 complaint filed under Section 806 of the Corporate and Criminal Fraud Accountability Act of 2002, Title XIII of the Sarbanes Oxley Act, Citigroup / Cullen; docket number 2-4173-12-080 is closed. Regarding your reference to case number 2012-SOX-00023; that case was docketed with the Office of Administrative Law Judges and falls exclusively within that offices' authority. OSHA will take no further action or communicate with you regarding either of those matters.

Should you have any future matters unrelated to docket number 2-4173-12-080 please raise them at the OSHA's New York Regional Office located at 201 Varick Street, NY, NY 10014.

Sincerely,

Robert D. Kulick

Regional Administrator

cc: US Department of Labor Office of Inspector General

1/31/18

MR KULICKE RUBIN LOPEZ.

ON BEHALF OF THE WOMEN & CHILDREN VICTIMS OF CITI TRUST AND WHISTLE BLOWER ME, AS PER F.O. I.L., PLEASE SEND TO MY HOME "ALL"

DOL & OSHA FILES RELATED TO THE ABOVE. MY CELL PH# 914 715 0282.

SINCERELY

WITNESS: CAROL A. CYLLEN and A. Cullen John Bullen

Occupational
Safety and Health
Administration

www.osha.gov

AOLATION NUMBER	LOCATION CODE	DATE VIOLATION NOTICE ISSUE	AMOUNT DUE
6185551	EY39	01/31/2018	APPEARANCE REQUIRED
	OFFENSE		LICENSE PLATE NUMBER
DISRUPT PERFORM	ANCE OF DUTIES OF G	OVERNMENT EMPLOYEES	
	ES OF AMERICA v.	DATE/TIME OF COURT APPEARANCE	COURT LOCATION
JOHN J CULLEN 208 BEECH ST		04/17/2018	US MAGISTRATE JUDGE
EASTCHESTER, NY 107	na	i	LONG ISLAND FEDERAL COURTHOUSE
	0.7	10:00 AM	100 FEDERAL PLAZA
	н		CENTRAL ISLIP, NY 11722-1438
By paying the amount adverse consequences to ement of the charge by call to contest this violation mution, your payment may bust your driving record, you To avoid a court appear.	ne, and place shown above nt due you may be admit you. You have a right to ling the Central Violation otice, (2) to a trial, and e reported to your state's i ur license or registration of trance, you must mail you the scheduled date, you to	ting to a criminal offense and a cooknow more about the charge agains Bureau at 800-827-2982. By pay (3) to be represented by counsel, motor-vehicle or driver-licensing against be suspended, and additional fewer payment at least 10 days before the will be subject to arrest. If you appear	our check or money order. Make it pays it or maney order. DO NOT SEND CA. ED," do not make any payment. You not may appear in a public recinist you and you may obtain a comping the amount due you waive your rill. If you are charged with a motor-vehiency. As a result, points may be assesses may be imposed by your state. It is date set for your court appearance. If it in court to plead guilty, or are convicent of \$5, \$10, or \$25. A check is accepton, call CVB at 800-827-2982 or visit
trial, the court may impose	,	en it is drawn. For futurer information	The state of the s
r trial, the court may impose	,	CIAL INSTRUCTIONS	ON OF PART OF VISIT

If payment has been sent, disregard this notice.

Detach this portion and return it with your payment U.S. Courts - CVB LOCATION CODE VIOLATION NUMBER AMOUNT DUE P.O. Box 71363 Philadelphia, PA 19176-1363 (800) 827-2982 **EY39** 6185551 APPEARANCE REQUIRED DEFENDANT'S NAME AND ADDRESS TO PAY BY CREDIT CARD, PLEASE COMPLETE THE FOLLOWING: Credit card type: □ VISA JOHN J CULLEN  $\square$  MC ☐ AMEX □ DISCOVER 208 BEECH ST Card holder name: EASTCHESTER, NY 10709 Credit card number: Telephone number: Expiration date: Signature: You may pay on-line at www.cyb.ascourts.gov or you may pay by check or money order made payable to: Central Violations Bureau. Write the violation member and hecation code on your check or money order.